

## **ATTACHMENT A (AMENDMENT)**

### **Facts**

#### **(Retaliation after June 23, 2017)**

1. Morse Elementary School Assistant Principal Ms. Nicole Penn conducted a group interview for summer positions, and it was stated in the email to the internal applicants that there would be no other time scheduled for these positions. However, the applicants who did not show up for the group interview were given the jobs/ positions. In fact, at least one of the candidates selected for a position was not a certified teaching assistant as it required.
2. Morse Elementary School Assistant Principal Ms. Nicole Penn gave me a 2nd interview for a summer position in July/August 2017 - 2nd but told Poughkeepsie City School District's lawyers I did not show up for the interview. However, there is written evidence contrary to her statement.
3. November 1, 2017, I was not approved for the empire state grant for my organization despite being the most successful program.
4. In January 2018, the District appointed an employee with less seniority to an afterschool program which is an extra assignment. My union's collective bargaining agreement (CBA) states that seniority is the most important factor in all extra assignments.
5. Principal Ms. Nadine Dargan, 2015- 2016, 2016 - 2017, 2017 - 2018, 2018- 2019 and this school year, has declined to provide an air conditioner although all others have window units. During warmer weather it becomes unbearable especially with computers running continually. I have not received a reason why everyone except me has a window air conditioner.
6. In April 20, 2018, \$427.20 was deducted from my paycheck that was not deducted in the past for the same reason. Then Assistant Superintendent for Human Resources Dr. Kathleen Farrell deducted the money from my check stating district policy and my unit contract but could not produce the applicable policy nor identify the section in my CBA. They had docked me another \$185.13 (which they shouldn't have), but they reimbursed me because they had docked me for the same day twice.
7. In June 2018, the Poughkeepsie City School District refused to interview me for summer positions of which I was qualified. Many others received the positions and most had less seniority than me.

#### **Acts of Implicit/Explicit Bias, Discrimination and Retaliation**

8. In September 11- 14, 2018 I received a phone call from Interim Superintendent Dr. Kathleen Farrell to take training for 4 days (Tuesday- Friday) from 8:00 AM to 4:00 PM. However, Dr. Eric Bradford Community Schools Grant Site Coordinator, applied restrictions to my training while

two white women were not limited. There were only three individuals who took this training, all were women (one Black (myself) and two White). Dr. Bradford allowed the two white women to receive full training while informing me that training started at different times. This purposeful misinformation caused me to receive only a very small fraction of the training than they did. Dr. Bradford had me wait for hours in the Poughkeepsie Middle School main office to speak to the school principal, Mr. D'Avilar, while training continued. After an inappropriate conversation regarding my presence there for training, the principal Mr. D'Avilar, sent me back to training. Dr. Bradford was visibly troubled by Mr. D'Avilar response. Dr. Bradford had the facilitator for this training, Ms. White from Creative Learning Systems, who is also white and is not an employee of the school district, to surveil me. She retained tabs/times of my whereabouts even to the bathroom. After Dr. Bradford and Ms. White said training had ended although it had not, Dr. Bradford along with Principal Mr. D'Avilar kicked me out of the Poughkeepsie Middle School. Both Mr. D'Avilar and Dr. Bradford ensured that I left the building. Dr. Bradford even followed me outside the school building.

9. On September 14, 2018, Dr. Farrell sent me an email about the training and lied about the events that took place.
10. In the months of August, September, October and November 2018, Poughkeepsie City School District's attorney Mr. Mark Rushfield in conjunction with Interim Superintendent Dr. Farrell continued to keep my settlement offer away from the Poughkeepsie City School District's School Board. The Board, collectively (not independently), are the only individuals who can make the decisions to either accept or reject the offer as the district policy states. Both Mr. Rushfield and Dr. Farrell are withholding the offer from the Poughkeepsie City School Board, which prevents any discussion and/or the ability to vote on any offer on the table. Mr. Rushfield and Dr. Farrell are purposefully preventing and thereby stopping the Poughkeepsie City School District School Board from settling with me which is another form and act of retaliation on my person.
11. December 5, 2018, I was not approved for the empire state grant for my organization despite being the most successful program.
12. June -August 2019 tried to have me moved from (and destroy) my media center even though it was the most successful in district history.
13. September 2020 Dr. Timothy Wade threatened to take sick pay from me.
14. September – November 2020 Morse School destroyed evidence that is imperative to my case.
15. October 2020 Dr. Timothy Wade threatened to have me fired.
16. October 2020 substituted for a teacher for 2 weeks but the district did not pay me.
17. October Principal Nadine Dargan destroyed my media center by moving it and placing it in a supply closet as an act of retaliation.
18. October Dr. Wade and Ms. Dargan tried put me as well as the students and community at risk of Covid-19.
19. November the Poughkeepsie City School District brought an unfounded 3020 against me to have me fired.